

Witco

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31 July 1996
Reference: 31024.04.01

Mr. Eric Newman
EPA Remedial Project Manager
United States Environmental Protection Agency
Region III-DE/MD Remedial Section (3HW42)
841 Chestnut Building
Philadelphia, PA 19107

**Re: Progress Report 7/16/96 through 7/31/96
Response Action Plan Implementation
Halby Chemical Superfund Site
Wilmington, DE**

Dear Mr. Newman:

In accordance with Section 8.7 of the Administrative Order for Removal Response Action (EPA Docket No. III-95-55-DC) for the Halby Chemical Site, Witco Corporation hereby submits a list of activities conducted from 16 July 1996 through 31 July 1996 and a list of planned activities for the next reporting period (1 August 1996 through 15 August 1996).

Activities Conducted During This Reporting Period

1. The Draft Field Treatability Study Plan was submitted to EPA on 19 July 1996. EPA reviewed the Plan and contacted Witco with concerns regarding the treatment regimes, off-gassing and other related issues. As discussed at a 28 July 1996 meeting with EPA, it was decided that additional laboratory testing should be conducted to replicate the treatment regimes prescribed for the field treatability. In addition, further laboratory studies are planned to confirm reaction byproduct generation for each treatment scenario.

In light of the additional laboratory testing, the field treatability schedule was modified. Witco proposes that the start date of the field work be tentatively set for 9 September 1996, but may change depending on the results and turn-around of the laboratory testing.

2. A pre-bid Site walk was conducted on 17 July 1996 for those contractors interested in bidding on the field treatability study and full-scale implementation of the in-situ treatment of the CS₂ contaminated soil. The contractors in attendance were:

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- Keller Environmental, Inc.,
 - Severson Environmental Services, Inc.,
 - CBA Environmental Services, Inc., and
 - Williams Environmental Services, Inc.
3. Two contractors, CBA Environmental Services/EHT and Williams Environmental Services, submitted bids on 29 July 1996. These bids are currently being reviewed by Witco.
 4. The evaluation of Laboratory Treatability Study analytical data continued and plans for additional testing were developed.
 5. Arrangements for pre-treatment sampling of the test plots were pursued. ADT, a drilling company, and several laboratories were contacted to bid on the sampling project and utility clearance was arranged.

On 26 July 1996, ERM and ADT conducted a brief Site walk and discussed the preliminary scope of the sampling project. Note: The preliminary scope called for 10 soil borings, two per test plot, and modified composite sampling of soil from 0 to 10 feet below grade surface. At the request of EPA, the sampling plan is being evaluated to determine if the proposed number of samples and/or composite sampling is the most appropriate approach to verify the treatment of CS₂ contaminated soils.

On 30 July 1996, a utility clearance was conducted to identify any potential concerns related to the field treatability test area. The subject area was cleared.

6. On 30 July 1996 the Site was inspected. The Site was secure and no issues of concern were observed.

Planned Activities for the Next Reporting Period

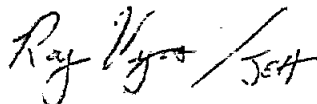
1. Additional laboratory testing will be conducted to specifically address items of concern regarding the field treatability study. Results obtained from this testing will be shared with EPA for review and discussion, and will be used to evaluate the appropriate course of action for the field treatability study.
2. The bid review and contractor selection process for the soil sampling and the implementation of the field treatability study and full-scale treatment will continue during this period.

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3. The Field Treatability Study Work Plan will be revised. The Plan will be revised to include a sampling strategy to evaluate the treatment of soils during the field treatability study, additional detail on the equipment proposed, and incorporation of findings from the additional laboratory treatability study.

If you have any questions or need additional information, feel free to call.

Sincerely,



Raj Vyas
Project Coordinator

RV

cc: Jane Biggs-Sanger, DNREC
Robert Root, CH₂MHill
Valerie Hahn, BCC
James Nortz, Witco
Bill Mercurio, Langan
Marc Gold, Manko
Paul Fahrenthold, Fahrenthold
Rich Dulcey, ERM

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